



**EARTHJUSTICE**  
BECAUSE THE EARTH NEEDS A GOOD LAWYER

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April 8, 2025

**VIA ECF**

Hon. Margaret M. Garnett  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *Northeast Organic Farming Association of New York, et al., v. U.S. Department of Agriculture*, Civil Action No. 1:25-cv-01529 (MMG)

Dear Judge Garnett:

On behalf of Plaintiffs Northeast Organic Farming Association of New York, Natural Resources Defense Council, and Environmental Working Group, I write pursuant to this Court's Rule II(B)(5) to respectfully request oral argument on Plaintiffs' Motion for a Preliminary Injunction. *See* ECF No. 15. Plaintiffs respectfully submit that oral argument would be of assistance to the Court because Plaintiffs' Motion presents issues of first impression for this Circuit concerning the "adequate notice" and "timely and equitable access" provisions of the Paperwork Reduction Act. *See* 44 U.S.C. §§ 3506(d)(1), (3). Oral argument would also be handled by a less experienced attorney who played a substantial role in drafting the underlying filings. *See* Rule II(A)(4).

Respectfully submitted,



Jeffrey Stein

cc: All counsel via ECF